

STATEMENT OF BASIS (AI No. 155441)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0123617 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Thor Fabricating, LLC
Post Office Box Q
Franklinton, Louisiana 70438

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Michelle Bickham

DATE PREPARED: February 21, 2008

1. PERMIT STATUS

A. Reason For Permit Action:

First time issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. NPDES permit - N/A
NPDES permit effective date: N/A
NPDES permit expiration date: N/A

C. LWDPs permit - N/A
LWDPs permit effective date: N/A
LWDPs permit expiration date: N/A

D. Date Application Received: February 1, 2008

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - steel fabrication shop

Thor Fabricating, LLC is an existing steel fabrication shop. Steel is cut with an ultra high pressure water jet. Garnet abrasive is added to the jet water, and cooling water is run through a heat exchanger to cool the process. The steel is fabricated into products (mostly hydraulic marine cranes), and the waste metal is sold as scrap to a metal recycler. The used garnet is disposed of by a licensed contractor.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: III
4. SIC code: 3441

C. LOCATION - 17507 Highway 25, Franklinton, Washington Parish
Latitude 30°46'41", Longitude 90°10'16"

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3. OUTFALL INFORMATION

Outfall 001

Discharge Type: water jet cutting wastewater and cooling water
 Treatment: settlement chamber (cooling water commingles after treatment)
 Location: at the point of discharge from the pipe located on the southwest side of the facility (Latitude 30°46'41", Longitude 90°10'16")
 Flow: 1000 gpd
 Discharge Route: local drainage thence to Daniel Branch Creek thence to the Bogue Chitto

Outfall 002

Discharge Type: treated sanitary wastewater
 Treatment: sewage treatment plant
 Location: at the point of discharge from the sewage treatment plant located on the southeast side of the facility (Latitude 30°46'41", Longitude 90°10'16")
 Flow: 250 gpd
 Discharge Route: local drainage thence to Daniel Branch Creek thence to the Bogue Chitto

4. RECEIVING WATERS

STREAM - local drainage thence to Daniel Branch Creek thence to the Bogue Chitto

BASIN AND SEGMENT - Pearl River Basin, Segment 090505

DESIGNATED USES - a. primary contact recreation
 b. secondary contact recreation
 c. propagation of fish and wildlife

5. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

6. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

There have been no inspections at the facility.

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B. DMR Review/Excursions

There have been no DMR's as the facility has never had a permit.

7. ENDANGERED SPECIES

The receiving waterbody, Subsegment 090505 of the Pearl River Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 24, 2007 from Boggs (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

8. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

9. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

10. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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Rationale for Thor Fabricating LLC

1. Outfall 001 - water jet cutting wastewater and cooling water (estimated flow - 1000 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow	Report:Report	
Oil and Grease	---:15 mg/L	similar discharges; BPJ
COD	200:300 mg/L	similar discharges; BPJ
TSS	---:45 mg/L	similar discharges; BPJ
pH	6.0 - 9.0 s.u.	similar discharges; BPJ

Treatment: settling chamber

Monitoring Frequency: 1/quarter for all parameters at the point of discharge from the southwest side of the facility

Limits Justification: Limits and monitoring frequency based on BPJ and on similar facilities (Water Cut, LA0109584). Temperature not included as discharge limitation as cooling water only comprises a small part of the total flow.

2. Outfall 002 - treated sanitary wastewater (estimated flow - 250 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Weekly Avg (mg/l)	<u>Reference</u>
Flow	Report:Report	
BOD ₅	---:45 mg/L	LPDES General Permit LAG530000
TSS	---:45 mg/L	LPDES General Permit LAG530000
Fecal Coliform	---:400 col/100mL	LPDES General Permit LAG530000
pH	6.0 - 9.0 s.u.	LPDES General Permit LAG530000

Treatment: sewage treatment plant

Monitoring Frequency: 1/6 months for all parameters at the point of discharge from the sewage treatment plant located on the southeast side of the facility

Limits Justification: LPDES General Permit LAG530000, Schedule B

BPJ Best Professional Judgement
 su Standard Units

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NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water coverage shall not be required in an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 3441 are considered to have storm water discharges associated with industrial activity.

The SWP3 shall be prepared, implemented, and maintained within (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in the storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).

303(d)/TMDL WATERBODIES

Subsegment 090505 is listed on LDEQ's Final 2006 303(d) List as impaired for pathogen indicators. To date no TMDL's have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDL's for the Pearl River Basin, those suspected causes for impairment which are not directly attributed to the steel fabrication point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause or have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

Therefore, for the purposes of this permit, the pathogen indicator impairment will be addressed in a manner consistent with the Department's permitting guidance for implementing Louisiana's surface water quality standards as follows:

Pathogen Indicator

To protect against the further impairment of the pathogen indicator impairment cause, a fecal coliform limit has been placed on the Outfall 002.